

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	Case No. 1:24-cr-83-TBM-BWR
	§	
TYLER SURLA	§	

**UNOPPOSED MOTION TO CONTINUE TRIAL  
AND RESET PRETRIAL DEADLINES**

TO THE HONORABLE TAYLOR B. MCNEEL:

COMES NOW TYLER SURLA, DEFENDANT, and files this Motion to Continue Trial and Reset Pretrial Deadlines, for cause showing the Honorable Court as follows:

**1. Posture of the case.**

Defendant was arraigned on the Superseding Indictment on September 4, 2024. The Government has provided discovery, which undersigned continues to review and discuss with Defendant.

**2. Reason for this request.**

The parties are in settlement discussions. The Defense requests additional time to arrange and complete a psychological evaluation that may aid the parties in reaching an agreed resolution.

Furthermore, a psychological evaluation will provide undersigned needed guidance in effectively advising Defendant.

**3. A continuance would serve the ends of justice.**

The Defense consents and agrees that the requested delay shall be deemed “excludable delay” under the Speedy Trial Act, 18 U.S.C. §3161(A)(7)(i) and (iv) because, *inter alia*, proceeding to trial on the current trial schedule would deny counsel reasonable time necessary for effective preparation. The Defense furthermore consents and agrees that the ends of justice served by a continuance in this case would outweigh the best interest of the public and Defendant in a speedy trial.

**4. Relief requested.**

Defendant respectfully requests that the Honorable Court continue trial and reset all pretrial deadlines.

Respectfully submitted,

LAW OFFICES OF SEAN BUCKLEY, PLLC

/s/ Sean Buckley  
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**CERTIFICATE OF CONFERENCE**

I certify that on November 14, 2024 I discussed this Motion with AUSA Lee Smith, who stated that the Government is UNOPPOSED.

/s/ Sean Buckley  
Sean Buckley

**CERTIFICATE OF SERVICE**

I certify that I provided a copy of this Unopposed Motion to Continue Trial and Reset Pretrial Deadlines to AUSA Lee Smith and all parties via the ECF system on this the 14<sup>th</sup> day of November 2024.

/s/ Sean Buckley  
Sean Buckley